From: Crawford, Dorothy [Crawford.Dorothy@epa.gov]

Sent: 4/18/2018 8:07:58 PM

To: Crawford, Dorothy [Crawford.Dorothy@epa.gov]; Intermont, Donna, NMENV [Donna.Intermont1@state.nm.us];

Singleton, Kerwin, NMENV [Kerwin.Singleton@state.nm.us]; Baca, Michael, NMENV [michael.baca1@state.nm.us]; judy.fisher@state.nm.us; mary.hilbert@state.nm.us; Butt, Neal, NMENV [Neal.Butt@state.nm.us]; Verhalen,

Frances [verhalen.frances@epa.gov]

Subject: NMED 2015 & 2016 Exceptional Event demos; Mitigation Plans/Fugitive Dust; Clean Data process info- Call (202)

991-0477 code 5157457

Start: 6/20/2018 8:00:00 PM **End**: 6/20/2018 9:00:00 PM

Show Time As: Busy

Required Intermont, Donna, NMENV; Singleton, Kerwin, NMENV; Baca, Michael, NMENV; judy.fisher@state.nm.us; Hilbert,

Attendees: Mary, NMENV; Butt, Neal, NMENV; Verhalen, Frances

Notes from 4/18/18 call are below. If I misunderstood or unintentionally misrepresented a topic, please let me know.

• Discussed 'I' vs 'r' flagging (follow-up to national call preceding 4/18 call with NMED).

- Dot provided input into expectations of Demonstrations for post 10/1/18 events if NMED relies on Mitigation Plan for Not Reasonably Controllable/Preventable criteria.
 - Discussed public notification evidence (e.g., copy of event specific dust alert, number of entities on listserv receiving notification, NMED outreach records on listserv).
 - NMED does not plan to have an inspection program for the Fugitive Dust Rule implementation, enforcement derived from complaints.
 - Brief discussion of obtaining event specific information from local/county entities dust control efforts, mentioned in Mitigation Plan.
 - Discussion of what evidence or information might be available to include in Demonstrations regarding Agricultural NRCS BMP outreach or implementation.
- General discussion of current list (excel file) of 2015, 2016, and 2017 exceedances in Luna and Dona Ana Counties.
- Two exceedances at 35-013-0024 (one in 2016 and one in 2017) correlate with exceedances at all 6 PM10 monitors in Luna and Dona Ana Counties. While the two 35-013-0024 exceedances do not currently have regulatory significance, the evidence relevant to the two days will likely be presented in the Demonstrations NMED prepares for the other monitor exceedances that do have regulatory significance.

Dot owes NMED input on Mitigation Plan possible future regional 'completeness' review regarding the status of mechanism for intra-air agencies collaboration. Current draft Mitigation Plan indicate the development of the mechanism is pending. See 4/24/18 email

Dot owes NMED input on whether 6/28/16 NMED letter on 2015 exceedances serves as post-2016 EE Rule Initial Notification. See 4/23/18, 5/10/18, and 5/11/18 emails

NMED owes Region 6 Initial Notification(s) for 2016 and 2017 exceedances, with proposed schedule for Demonstration submittal. Need to discuss in light of 5/10 and 5/11 emails for 2015 exceedances.

Agenda items for 6/6/18 6/20/18 call:

Schedule for demonstration submittals (2015, 2016, 2017) and prioritization of demonstration

preparation.

Update on EE Mitigation Plan preparation, public notice period, and future plan submittal (due

date 9/30/18).